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THOMAS AMBROSIO

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Member of NJ & NY Bars

March 12, 2020

VIA ECF

Hon. Ronnie Abrams, U.S.D.J.
Thurgood Marshall
United States Courthouse
40 Foley Square
New York, NY 10007

RE: USA vs Fernando Keyes
Indictment 20-cr-95

Application granted. The conference is adjourned to April 2, 2020 at 2:30 p.m. Time is excluded to April 2, 2020, under the Speedy Trial Act, pursuant to 18 U.S.C. Section 3161(h)(7)(A).

SO ORDERED


Ronnie Abrams, U.S.D.J.
March 12, 2020

Dear Judge Abrams:

I represent Fernando Keyes on the above referenced indictment. This matter is scheduled for a status conference tomorrow before Your Honor tomorrow at 12 noon. I am respectfully requesting that Your Honor adjourn the status conference for at least 2 weeks.

On March 2, 2020 the Government emailed me a plea offer for Mr. Keyes. He is detained at the MCC, but as a result of the extended lockdown of the MCC, yesterday was my first opportunity to discuss the plea offer with him.

In the midst of the coronavirus pandemic I also believe that it would be unwise to expose Your Honor and court personnel to possible coronavirus exposure during a status conference.

I have corresponded with AUSA Alexandra Rothman and she does not object to my request for an adjournment.

I thank Your Honor for your consideration of this adjournment request.

Respectfully yours,

/s/Thomas Ambrosio
Thomas Ambrosio

cc: All counsel (via ECF)